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*Attorneys for Defendants Ethicon, Inc. and
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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

BARBARA SMITH and GARY SMITH,

Plaintiffs,

v.

ETHICON, INC., ETHICON LLC and
JOHNSON & JOHNSON,

Defendants.

Civil No.: 3:20-cv-00851-MO

**JOINT MOTION FOR MODIFIED
PRETRIAL SCHEDULING ORDER**

WHEREAS THE COURT HAS ORDERED the parties to present revised pretrial submissions identified below; and

WHEREAS the parties have conferred and agreed that with additional time significant progress can be made in reducing the objections and issues that would require determination by the court;

IT IS HEREBY JOINTLY STIPULATED AND AGREED by and between the parties and their respective counsel that the following pretrial submissions shall be filed with the Court on or before August 30, 2022:

- 1) Each party's revised trial exhibit lists, and the opposing party's objections;
- 2) Each party's revised witness lists, and the opposing party's objections;
- 3) Each party's deposition designations and all counter-designations and objections;
- 4) Each party's revised proposed jury instructions;

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5) Supplemental Daubert motions limited to issues presented in the MDL but reserved for later decision or otherwise not decided by the MDL Court; and

6) Joint evidentiary stipulations.

IT IS HEREBY STIPULATED this 1st day of July, 2022.

DATED: July 1, 2022

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2022

Hon. Michael W. Mosman
UNITED STATES DISTRICT JUDGE

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